

1. Information Request Questions

- a. John W. Barto, Jr. 20 Sudol CT Cheshire, CT 06410
- b.
 - i. John W. Barto, Jr.
 - ii. Senior Sales Executive
 - iii. 20 Sudol CT Cheshire, CT 06410
 - iv. 203.768.8687, jbarto@avivametals.com, no fax#
- c. N/A

2. Legal and Financial Information

a. I am no longer an employee of any of the subject businesses and do not have these filings. I held various roles within the business but was never an officer of the company. Raymond McGee is the CEO and owner and would have access to this type of documentation. I am aware that he is a party to this inquiry and will be supplying the requested information in this section as well as others that specify documentation.

- b. See above
 - i. I do not have knowledge as to why
 - ii. I was not aware this
- c. Please refer to the answer in 2.a.
- d. Please refer to the answer in 2.a
- e. I did not file any loan applications on behalf of the company
- f. Please refer to the answer in 2.a
- g. incorporated
 - i. June 2002
 - ii. DE
 - iii. Raymond McGee CEO, Steve Turner CFO & Treasurer, Larry Ford VP of Production, Jeff Lawlor VP of Sales
 - iv. There were no directors
 - v. Raymond McGee 7 Pine Ledge Brant Lake, NY 12815
ph# 518.494.3218 Shares: 100%
 - vi. N/A
- h. Respondent has not filed for bankruptcy to my knowledge
- i. N/A
- j. N/A
- k. I am unsure as to the exact information on this but to the best of my knowledge, American Brass first owned the site followed by Anaconda American Brass, then by ARCO/BP, then by the Ansonia Copper and Brass ESOP.
- l. I do not possess any signed documents
- m. N/A
- n. Steve Turner 323 Woodpond Rd. Cheshire, CT 06410 ph# 203.272.2835
- o. I am unaware of any UCC filings.
- p. I am unaware of the existence of corporate minutes

3. Relationship(s) to Other Entities

- a. I do not possess any such documents.
- b. I had rough drafts of the ASM, LLC asset purchase agreements for review but did not receive a final copy.

- i. The asset purchase agreement pertained to buying the tube making assets of ACB.
 - ii. December 2012-? I am unsure as to when the actual agreement ended
 - iii. CUNI Casting, LLC had an agreement with ACB to produce CuNi billets for ASM. I am unaware of any Hazmats used in this process.
- c. BWM Metals was the parent company of both ASM and CUNI Casting. I do not possess any documents
 - i. Relationship was as described in 3.iii.
 - ii. Same timeframe noted in 3.ii.
- d. BW Metals was a shareholder of BWM Metals. I do not possess any documents
 - i. BW Metals was a shareholder of BWM Metals
 - ii. Same timeframe noted in 3.ii.
- e. I do not possess any documentation from Del Mar Master Fund, Ltd.
 - i. Del Mar had loan agreements with ACB and acted as an asset-based lender.
 - ii. Though I am not certain, I believe ACB's agreement with Del Mar was entered in 2007.
- f. I do not possess any documentation from B.W. Capital Partners
 - i. I am not sure what agreements ACB had with B.W. Capital Partners. They were the parent private equity firm that formed BW Metals.
 - ii. Same timeframe as noted in 3.ii.
- g. I do not possess any documentation from William E. Wolf relating to the site.
 - i. William Wolf was a principal of B.W. Capital Partners
 - ii. Any such agreements would have related to the same timeframe noted in 3.ii.
- h. I do not possess any documentation from Raymond McGee relating to the site.
 - i. Raymond McGee is the owner and CEO of ACB
 - ii. 2002 to present
- i. I do not possess any documentation from McGee Family Holdings I relating to the site.
 - i. McGee Family Holdings I is a real estate owner in Waterbury, CT and I am unaware of any relationship with ACB
 - ii. N/A
- j. I do not possess any documentation from McGee Family Holdings II relating to the site.
 - i. I was not aware of this entity
 - ii. N/A

4. Insurance

- a. I do not possess any of the documentation that would support the information request in this section.
- b. I do not possess any of the documentation that would support the

- information request in this section.
- c. I do not possess any of the documentation that would support the information request in this section.
- d.

Ansonia Copper & Brass, Inc. - Insurance Policies					Insurance Allocation	
Policy Type	Insurer	Agent	Termination date	Liability retention limits	ASM/CUNI*	ACB
General Liability	National Union Fire (Chartis)	Assurance Agency	5/1/2013	No deductible	\$20,925.00	\$20,925.00
Crime	National Union Fire (Chartis)	Assurance Agency	5/1/2013	\$10,000.00	\$3,532.00	
Automobile	National Union Fire (Chartis)	Assurance Agency	5/1/2013	multiple based on item	\$5,690.00	
Umbrella	National Union Fire (Chartis)	Assurance Agency	5/1/2013	\$10,000.00	\$20,734.00	
Property	Navigators Insurance Company	Assurance Agency	6/1/2013	\$250,000.00	\$51,038.58	\$102,381.42
Boiler & Machinery	Liberty Mutual Insurance Group	Assurance Agency	6/1/2013	\$250,000.00	\$68,110.00	
Directors & Officers/EPLI/Fiduciary	Continental Casualty Co.	Assurance Agency	7/1/2013	multiple based on item		\$11,570.00
Workers Compensation	Chartis/Illinois National	Assurance Agency	2/25/2013	No deductible	\$740,184.00	
					\$910,213.58	\$134,876.42

- i. I do not have this information but the Assurance Agency should
- ii. I do not have this information
- iii. I do not have this information
- iv. I am not sure what the dates were but could surmise that they coincided with 3.ii.
- e. I do not have any settlement information nor I am aware
- i. N/A
- ii. N/A
- iii. I am not aware
- iv. I do not have this information
- f. I do not have this information
- g. See above chart in 4.d.
- h. I do not have this information but would assume ASM/CUNI and ACB

5. Lease(s)

- a. My employment with ACB began in July of 2002. I have no knowledge of leases prior to that. CUNI Casting is the only lease that I am aware of thereafter.
- i. CUNI Casting (lessee) ASM (lessor)
- ii. dates were concurrent with 3.ii.
- iii. Cuni Casting leased the casting building at ACB.
- b. I do not have this documentation. The lease was for the ACB casting shop only and was for the purpose of casting CuNi billets for ASM.
- c. The site was used for casting CuNi scrap into billet form.
- i. From 2012 through the almost the end of 2013 CuNi scrap was cast into billet for use in ASM's Waterbury Tube Mill.
- ii. December 2012 to roughly December 2013
- iii. Waste generated was metal oxides and slag. Dust oxides were stored in the baghouse and oxides in water were treated in the water pollution operation onsite.
- iv. Company employees carried out this work.
- v. N/A I am not aware of the use of contractors
- vi. \$6,666.67 was the monthly lease payment due ACB from CUNI

vii. The box shop building was demised in late 2014 by Denovo Construction.

viii. Manufacturing equipment other than casting equipment was sold or scrapped. Non-structural metals were recycled to fund ongoing expenditures as they related to environmental, safety and security concerns.

d. Cadmium, acid, alkaline degreaser, mercurous nitrate, caustic soda, various lab wastes, lead, there are likely more but this is what I can recall.

6. Respondent's Operations

a. June 2002 to December 2013

b. I can only assume that the activities on the site prior to my employment were very similar to 2002 to present. The site was purposed for manufacturing semi-finished non-ferrous metal products such as rod, wire and flatwire.

i. The company produced many different alloys through casting, extruding, annealing, drawing, pickling, cutting, and machining.

ii. most all non-ferrous alloying materials were used. Acids, oils (heating and hydraulic), alkaline degreaser, animal fat based soaps and lubricants, draw well drawing compound, gasoline, motor oil, paint, solvents, caustic soda, neutralizers.

iii. Process acids were stored in tanks or totes, oils in drums on skids within a birm, oils also existed in equipment foundation trenches/pits.

iv. I do not have a sketch of the locations in each mill however there were designated storage locations with signage indicating what was there.

c. I do not have any physical copies of any permits or licenses that pertained to the site.

d. I know that these documents existed but I do not have them.

e. I do not have access to these.

f. Waste

i. 1. Skimmings: areg, copper oxides, dross, AFRC ash, scrap metal, copper scale. 2. Cadmium baghouse dust, 3. Zinc baghouse dust 4. Copper hydroxide filter cake, 5. Furnace refractory, 6. Cooling tower Sludge, 7. Steel scrap & empty drums, 8. Alkaline degreaser, 9. Soap Tank soap, 10. Parts washer solution, 11 Haz waste tank, 12. Used oil 13. Oil soaked solids & floor sweepings, 14. Kester 3345 flux, 15. Fluorescent and Incandescent lamps, 16. Used batteries, 17 Used Electronic components, 18. Fluorescent light ballasts, 19. Mercury Scrap, 20 Lab waste, 21. Asbestos, 22. Scrap wood, 23. Cardboard, 24. Regular trash

ii. I do not possess this information but am aware that Ray McGee is providing it.

iii. I do not possess this information but am aware that Ray McGee is providing it.

iv. I do not possess this information but am aware that Ray McGee is providing it.

- v. I do not possess this information but am aware that Ray McGee is providing it.
- vi. I do not possess this information but am aware that Ray McGee is providing it.
- g. I do not have this information but I am aware there were NOV's.
 - i. I do not have this information
 - ii. I do not have this information
 - iii. I do not have this information
 - iv. I do not have this information

7. Respondent's Wastes and Waste Streams (including By-Products)

- a. I do not have the resources necessary to complete this section however I am aware that you will be receiving this information from Ray McGee
- b. See 7.a.

8. Respondent's Disposal/Treatment/Storage/Recycling/Sale of Waste (including By-Products)

- a. Larry Ford, Steve Cronk, Bob McGann, Steve Daniels, Santo Manicone
- b. Same as 8.a.
- c. Same as 8.a. to my knowledge
- d. All individuals listed below have the last contact information available.

Larry Ford VP of Production Supervisor Ray McGee

486 Lakeside West

Waterbury, CT

203.768.9128

Steve Cronk Safety Consultant Supervisor Ray McGee

203.494.0265

No other contact info available

Bob McGann Engineering Manager Supervisor Ray McGee

323 Lounsbury Dr

Waterbury, CT 06706

203.619.1567

Steve Daniels Facility Support Services consultant

203.288.1281

No other contact info available

Santo Manicone Owner Facility Support Services

2685 State Street

Hamden, CT

203.537.8427

- e. I do not have this information

9. Site Characteristics

- a. ACB is a 42-acre land plot adjacent to the Naugatuck River used for manufacturing since the late 1800's.
 - i. There were 8 surface structures on the plot: extrusion mill, rod mill, flatwire mill, powerhouse, admin building, pollution control, casting shop, box shop. The box shop was demised in 2014. There is a lagoon adjacent to the extrusion mill, gates on Liberty Street and River Street. There is a bridge spanning the Naugatuck River from River Street.

Fencing encloses the property from the east and a floodwall contains the property from the east. I also believe there is a settling pond on the NE corner of the property.

ii. There is a storm water system and a sanitary sewer. There are several UST's and drains.

iii. I do not know of any ground water wells

b. see attached map

c. I do not have the historical information on most all of these. I know there were occurrences but do not have records to detail.

i., ii. & iii. One that I am familiar with was a birm that had been cracked by truck inside the Rod Mill led to a slow leak down an incline into the storm water drain and into the river. It was determined to be very little and the birm was subsequently emptied of waste oil. I am not sure of the exact date but I believe it was in the 2nd quarter of 2016. DEEP and the US coastguard were dispatched to the site due to a visible sheen in the river.

d. The specific leak that I have knowledge of was abated by...

i. emptying the birm, putting oil absorbers in and around the drain.

A boom system was placed in the river and around the run out drain.

ii. removed waste oil from birms

e. I do not have this documentation

f. I do not have this information

g. I do not have this information

10. Information From Others

a. already included

11. Compliance With This Request

a.

i. Raymond McGee

ii. Retired 7 Pine Ledge Brant Lake, NY 12815 ph#203.231.3542

iii. CEO and Owner

iv. Yes

v. N/A

vi. I did not review documents since I do not have access.

viii. N/A

12. Document Retention

a. I am not aware of any documents that are not available. I am aware that Ray McGee has access to most all requested documentation. Since he is a Respondent in this inquiry I have not requested information from him since it would be redundant. My knowledge of this Ansonia site is quite limited since I spent all but 1.5 of my 14 years with ACB at the Waterbury site.

i. The document retention policy as it pertained to customers was 10 years.

ii. I am not aware of any organized document destruction.

iii. N/A

iv. N/A

v. Consult Ray McGee.

a. If not already included in your response, if you have reason to believe that there may be persons able to provide a more detailed or complete response to any of these questions or who may be able to provide additional responsive documents, (including but not limited to information about current and past uses of the Site) identify such persons and the additional information or documents that they may have.

11. Compliance With This Request

a. Describe all sources reviewed or consulted in responding to this request, including but not limited to:

- i. the names of all individuals consulted;
- ii. the current job title, job description, address and telephone number of each individual consulted;
- iii. the job title and job description during the period being investigated of each individual consulted;
- iv. whether each individual consulted is a past employee of Respondent;
- vi. the nature of all documents reviewed;
- vii. the locations where those documents reviewed were kept prior to review; and
- viii. the location where those documents reviewed are currently kept.

12. Document Retention

a. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:

- i. your document retention policy;
- ii. a description of how the records were destroyed (e.g., burned, archived, trashed) and the approximate date of destruction;
- iv. a description of the type of information that would have been contained in the documents; and
- v. the name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

The following form of declaration must accompany all information submitted by Respondent in response to the Information Request:

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of

John Barto (JOHN BARTO)
Respondent

and that the foregoing is complete, true, and correct.

Executed on 2/16, 2018

John Barto
Signature

JOHN BARTO
Type Name

FORMER EMPLOYEE
Title